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10 Attorneys for Defendant  
EVERGREEN PULP, INC.

11  
12 UNITED STATES DISTRICT COURT  
13 NORTHERN DISTRICT OF CALIFORNIA  
14

15 CALIFORNIANS FOR ALTERNATIVES TO  
TOXICS, a California non-profit corporation;  
16 and THE ENVIRONMENTAL PROTECTION  
INFORMATION CENTER, a California non-  
17 profit corporation,

18 Plaintiffs,

19 vs.

20 EVERGREEN PULP, INC.,

21 Defendant.  
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Case No. C 06 0002 EDL

STIPULATION AND ~~PROPOSED ORDER~~  
MODIFYING PRETRIAL SCHEDULE

1 Plaintiffs Californians for Alternatives to Toxics and The Environmental Protection  
2 Information Center ("Plaintiffs") and defendant Evergreen Pulp, Inc. ("Evergreen") met with  
3 Magistrate Judge Wayne Brazil for a mandatory settlement conference on January 11, 2007. At  
4 that settlement conference Judge Brazil recommended, in aid of settlement negotiations, certain  
5 amendments to the current pretrial schedule. The parties agreed, and hereby stipulate, as follows:

6 1. Pursuant to the Stipulated Order entered by the Court on December 2, 2006, the  
7 last day for the Plaintiffs to move to compel further production of documents described in the  
8 categories set forth in the December 26, 2006 order is currently January 12, 2007. The parties  
9 hereby stipulate and agree, and request that the Court order, that the January 12, 2007 deadline for  
10 filing such a motion to compel be further extended to February 2, 2007.

11 2. Pursuant to the Scheduling Order in this action, the deadline for completion of  
12 expert discovery in this action is currently February 5, 2007. The parties hereby stipulate and  
13 agree, and request that the Court order, that the February 5, 2007 expert discovery cutoff be  
14 further extended to February 20, 2007.

15 3. In order to facilitate the informal resolution of factual issues and avoid the  
16 necessity for or scope of pretrial motion practice, on or before January 19, 2007, the Plaintiffs  
17 shall provide Evergreen with a draft fact stipulation, and Evergreen shall provide Plaintiffs with a  
18 written response to the proposed fact stipulation by January 29, 2007. Magistrate Judge Brazil is  
19 available to handle telephonically any problems with this process which may arise.

20 4. On or before January 26, 2007, counsel for Evergreen shall provide Magistrate  
21 Judge Brazil with a verbal status report concerning the issues discussed at the January 11, 2007  
22 mandatory settlement conference.

23 5. The proposed amendment contained herein shall not affect any other deadline  
24 established in the Scheduling Order and subsequent orders.

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26 IT IS SO STIPULATED.  
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1 Dated: January 12, 2007

EVERGREEN PULP, INC.

2  
3 By: \_\_\_\_\_ /s/

4 DAVID D. COOKE  
Attorney for Defendant

5 Dated: January 12, 2007

CALIFORNIANS FOR ALTERNATIVES TO  
TOXICS and THE ENVIRONMENTAL  
PROTECTION INFORMATION CENTER.

6  
7 By: \_\_\_\_\_ /s/

8 WILLIAM VERICK  
Attorney for Plaintiffs

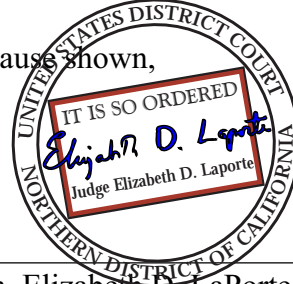
9  
10 Attestation Regarding Signature: This document is being filed electronically under my  
11 User ID and Password. Pursuant to General Order 45, Section X.B, I hereby attest that  
12 concurrence in this filing of this document has been obtained from each of the other signatories to  
13 this document. I declare under penalty of perjury under the laws of the United States that the  
14 foregoing is true and correct. Executed January 12, 2007.

15  
16 By: \_\_\_\_\_ /s/

17 DAVID D. COOKE  
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ORDER

Pursuant to the parties' stipulation, and for good cause shown,  
IT IS SO ORDERED.



Dated: January 16, 2007

By: \_\_\_\_\_

Hon. Elizabeth D. LaPorte  
United States Magistrate Judge

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